

REMARKS

In the Final Office Action, the Examiner:

- a) rejects claims 16, 17, and 19 under 35 U.S.C. 112, second paragraph, as being indefinite; and
- b) rejects claims 16-19 under 35 U.S.C. 102(b) as being anticipated by Kanazawa et al. (Japan Application Publication No. 2001 -054147, hereinafter "*Kanazawa*").

Status of the Claims

By this Amendment, Applicant has amended claims 16, 17, and 19, canceled claims 20-35 without prejudice or disclaimer of their subject matter, and added new claims 36-51. Support for the amendments can be found throughout Applicant's specification and in the drawings as originally filed.

Response to Claim Rejection under 35 U.S.C. § 112, Second Paragraph

Applicant has amended claims 16, 17, and 19 to address the rejection and thus respectfully requests withdrawal of the rejection under 35 U.S.C. 112, second paragraph.

In particular, claim 16 has been amended to recite ". . . a visual field of the image sensor is fixed with respect to a distance and an angle between the image sensor and the screen." Claim 17 has been amended to recite "timing-stamping the first images with a current time." Claim 19 has been amended to recite "determining the number of sensor elements of the image sensor traversed by the first images." Applicant's specification specifically defines the "number of picture elements" as an amount of

picture elements of the image sensor traversed by a test pattern. See Applicant's specification, paras. [0058] and [0075].

Response to Claim Rejection under 35 U.S.C. § 102

Applicant respectfully traverses the rejection of claims 16-19 under 35 U.S.C. 102(b) as being anticipated by *Kanazawa*.

In order to properly establish that *Kanazawa* anticipates claim 16 under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, (Fed. Cir. 1989).

Claim 16 recites a combination including, for example, "capturing . . . a plurality of **first images** of a test pattern moving on [a] screen at a pattern velocity while a visual field of [an] image sensor is **fixed** with respect to a distance and an angle between the image sensor and the screen," "determining the pattern velocity based on **the first images**," and "capturing a **second image** of the test pattern while the test pattern is moving on the screen at the pattern velocity and the image sensor is moving at [a] sensor velocity [corresponding to the pattern velocity]" (emphasis added).

Kanazawa describes a data acquisition and measurement device for collecting data from a display device and measuring a dynamic characteristic of the display device. See *Kanazawa*, Abstract. *Kanazawa* states that "[a] rotation control signal (c) to rotate a rotary mirror 3 synchronously with the image signal (a) is given to a driver 4."

See *Kanazawa*, Abstract. *Kanazawa* further states “[t]he control device 6 **changes the phase of the roll control signal c** sent to the drive 4 of the rotating mirror 3 synchronizing with it, and controls the revolving speed of the rotating mirror 3 while it changes the frequency and movement speed of the sine wave 30 to the picture signal generator 1 **by sending the image control signal b**” (emphasis added). See *Kanazawa*, para. [0028] and Figure 1.

Accordingly, the control device of *Kanazawa* synchronizes the rotation of the mirror with the sine wave **by synchronizing the signal (b) to the display screen and the signal (c) for rotating the mirror**. *Kanazawa*, however, does not teach or suggest determining the pattern velocity based on the images rendered on the display screen and then using the pattern velocity to determine the sensor velocity for the image detector. As a result, *Kanazawa* fails to disclose “capturing, by an image sensor, a plurality of **first images** of a test pattern moving on [a] screen at a pattern velocity while a visual field of the image sensor is **fixed** with respect to a distance and an angle between the image sensor and the screen,” “determining the pattern velocity based on **the first images**,” and “capturing a **second image** of the test pattern while the test pattern is moving on the screen at the pattern velocity and the image sensor is moving at [a] sensor velocity,” as now recited in claim 16 (emphasis added). For this reason, Applicant respectfully submits that *Kanazawa* fails to teach or suggest every element of claim 16. For at least these reasons, claim 16 is not anticipated by *Kanazawa*.

Depending claims 17-19 are also not anticipated by *Kanazawa*, at least by virtue of their dependence from claim 16. The rejections under 35 U.S.C. 102(b) should be withdrawn.

New Claims

New independent claim 36 incorporates all of the elements of amended claim 16. For at least the reason discussed above, Applicant respectfully submits that claim 36 is also allowable over the *Kanazawa* reference.

New claims 37-51 depend from one of the allowable independent claims. For at least the same reasons discussed above, Applicant respectfully submits that these new claims are also allowable.

Conclusion

Applicant respectfully requests that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing all pending claims in condition for allowance. Applicant submits that the proposed amendments and the addition of new claims do not raises new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Further, Applicant submits that the entry of the amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing, Applicant submits that all claims are in condition for allowance and requests reconsideration of the application and withdrawal of the rejections. Accordingly, Applicant requests a favorable action.

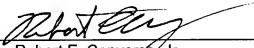
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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By: _____


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